

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

**UNITED STATES OF AMERICA,  
Plaintiff**

**v.**

**Criminal No. 3:16-CR-28-001**

**KEITH FREEMAN,  
Defendant**

**DEFENDANT'S RECIPROCAL DISCOVERY DISCLOSURE**

Comes now the Defendant, Keith Freeman, through his counsel, Nicholas Forrest Colvin, Esq. and submits the following reciprocal discovery disclosure. This pleading is filed in accordance with Rule 16(b) of the Federal Rules of Criminal Procedure, Local Rule of Criminal Procedure 16.01 and in response to the Government's request for discovery.

1. The Defense does not possess any photograph books, papers, documents, photographs, tangible objects or copies or portions thereof within the possession, custody or control of the Defendant to provide to the Government at this time however such a determination based upon continued investigation and analysis may occur and the Defendant reserves the right to supplement this request as necessary and appropriate to the fair and just disposition of this matter.
2. The Defense does not possess any results of physical or mental examinations or scientific tests made in connection with this case within the possession, custody or control of the Defendant to provide to the Government at this time however such a determination based upon continued investigation and analysis may occur and the Defendant reserves the right to supplement this request as necessary and appropriate to the fair and just disposition of this matter.

3. The Defense does not possess any documentation or other pertinent information relating to the Government's FRE Rule 702, 703 or 705 request at this time however such a determination based upon continued investigation and analysis may occur and the Defendant reserves the right to supplement this request as necessary and appropriate to the fair and just disposition of this matter.

Respectfully Submitted,  
Keith Freeman, By Counsel

/s/ Nicholas Forrest Colvin, Esquire

Nicholas Forrest Colvin, Esquire  
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**CERTIFICATION OF SERVICE**

I hereby certify that on August 19<sup>th</sup>, 2016 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Anna Krasinski, Esquire AUSA  
Office of the United States Attorney  
U. S. Courthouse  
217 W. King Street, Suite 400  
Martinsburg, WV 25401

/s/ Nicholas Forrest Colvin, Esquire

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